

**EXHIBIT 12**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

-against-

RICHARD XIA, a/k/a YI XIA; and  
FLEET NEW YORK METROPOLITAN  
REGIONAL CENTER, LLC, f/k/a FEDERAL  
NEW YORK METROPOLITAN REGIONAL  
CENTER, LLC,

Defendants,

-and-

JULIA YUE, A/K/A JIQING YUE; XI VERFENSTEIN;  
and XINMING YU,

Relief Defendant.

21 Civ. 5350 (PKC)

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S EIGHTH REQUEST  
FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (“FRCP”), plaintiff Securities and Exchange Commission (the “Commission”) requests that Defendants Richard Xia (“Xia”) and Fleet New York Metropolitan Regional Center LLC (“Fleet”), in accordance with the definitions and instructions set forth below, produce the documents called for by the following document requests (the “Requests”) within thirty days from the date of service of these Requests, at the Commission’s offices, located at 100 Pearl Street, Suite 20-100, New York, NY 10004-2616.

## **DEFINITIONS**

1. The definitions and constructions set forth in Local Rule 26.3(c) and 26.3(d) are fully incorporated here by reference.
2. “Action” means the above-captioned Commission enforcement action.
3. “Xia Entity” or “Xia Entities” means, individually and collectively, any of: Amazon River LLC, Fleet Financial Group Inc., JiQing Development Group Inc., Manekinko Group LLC, Samuel Development Group LLC, Shangri-La 9D Inc., Shangri-La 9F Inc., Shangri-La Green Inc., and X&Y Development Group LLC. Each “Xia Entity” shall also include that entity’s employees, officers, directors, partners, agents, or other persons authorized to act on behalf of the entity.

## **INSTRUCTIONS**

1. Produce all documents described in the Requests below, insofar as the documents are in Defendants’ possession, custody, or control, under FRCP 34(a), including without limitation documents in the custody or control of Defendants’ attorneys or agents.
2. Defendants do not need to re-produce documents that were produced by Defendants to the Commission during the pre-Complaint investigation.
3. Under FRCP 4(b)(2)(B), with respect to each numbered category of the Requests below, respond by either stating that Defendants will produce such documents (by producing copies or producing originals for inspection and copying) or stating with specificity the grounds for objecting to the request, including the reasons.
4. Under FRCP 34(b)(2)(C), any objection Defendants make to producing documents responsive to a numbered category below must state whether any responsive documents are being withheld on the basis of that objection. An objection to part of a request must specify the part and permit inspection of (or Defendants must produce) the remaining documents.
5. For each document, or portion thereof, that Defendants seek to withhold on the basis of any privilege or protection, provide a written response containing the information required by FRCP 26(b)(5)(A) and Local Rule 26.2.
6. The relevant period that applies to these Requests, unless otherwise stated, is January 1, 2010 through the present (the “Relevant Period”).
7. These Requests are continuing. To the extent that Defendants obtain information or documents that change or require correction or supplementation of Defendants responses to the Requests after Defendants serve Defendants’ responses on the Commission, Defendants must promptly serve supplemental responses reflecting the new information and produce any additional documents, pursuant to FRCP 26(e)(1).

**DOCUMENT REQUESTS**

1. All 1099 forms or similar records issued by or to any Xia Entity.

Dated: January 12, 2024  
New York, New York

By: /s/ Christopher M. Colorado  
Christopher M. Colorado  
David Stoelting  
Kim Han  
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